UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

U.S. DISTRICT COURT INDIANAPOLIS DIVISION
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SOUTHERN DISTRICT OF INDIANA LAURA A. BRIGGS CLERK

STATE OF INDIANA,) LAURA A BRIGGS
Plaintiff,)
v.) CAUSE NO. IP99-0853-C-Y/S
SENIOR CITIZENS REMODELING, INC.,)
SENIOR CITIZENS REMODELING OF INDIANA, INC.,)))
HARVEY JACK WALLER,)
ROBERT OLSON, SR.,)
ROBERT OLSON, JR.,)
JEFF HOSTETTER,)
))
Defendants.)

CORRECTED MOTION FOR DEFAULT JUDGMENT

Plaintiff, State of Indiana, by counsel, Attorney General Steve Carter by his deputy, Roy P. Coffey, and moves for entry of default judgment against Defendant, Senior Citizens Remodeling, Inc., pursuant to Fed. R. Civ. Proc. 55 based upon the following:

- On June 9, 1999, Plaintiff filed a complaint against Defendant, Senior Citizens Remodeling, Inc., in this Court. The complaint and summons were served via certified mail on June 10, 1999.
- 2. Defendant, Senior Citizens, Inc., therefore was required to respond to the complaint by June 30, 1999.

- By Order of this Court, the time for Defendant, Senior Citizens Remodeling,
 Inc., to appear in this cause and answer Plaintiff's complaint was extended to May 24, 2000.
- 4. To date, Defendant, Senior Citizens Remodeling, Inc., has failed to answer or otherwise respond to Plaintiff's complaint.

WHEREFORE, Plaintiff, State of Indiana, prays for entry of default judgment against Defendant, Senior Citizens Remodeling, Inc.,, in an amount commensurate with its damages, plus interest accruing, punitive damages to be determined at a trial on damages, all costs of this action, injunctive relief, and for all other relief which this Court may deem appropriate.

Respectfully submitted,

STEPHEN CARTER Attorney General of Indiana Atty. No. 4150-64

Roy P. Coffey

Deputy Attorney General

Atty. No. 3939/29

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Default Judgment has been duly served upon the following by United States Mail, first class, postage prepaid, this day of February, 2001.

Senior Citizens Remodeling, Inc. c/o CT Corporation, Resident Agent One North Capitol Avenue Indianapolis, IN 46204-3900

Roy P. Coffey

Office of Attorney General I.G.C.S. - Fifth Floor 402 West Washington Street Indianapolis, IN 46204-2770 Telephone: (317) 232-6325

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